

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA**

SHARON M. GUTHRIE,)	
)	
Plaintiff,)	
)	
v.)	No. 1:22-CV-162-DCLC-SKL
)	
UNITED STATES OF AMERICA,)	
)	
Defendant.)	

EXPERT DISCLOSURES

The United States of America, by and through Francis M. Hamilton III, United States Attorney for the Eastern District of Tennessee, pursuant to Rule 26(a)(2)(A) of the Federal Rules of Civil Procedure, hereby discloses that it may call **James Norris, P.E.**, as an expert witness to present evidence under Rule 702, Rule 703 and/or Rule 705 of the Federal Rules of Evidence. Mr. Norris's written report required by Rule 26(a)(2)(B) is attached. The information required by Rule 26(a)(2)(B)(i)-(vi) is either contained in the written report or is provided in the attachments thereto. Pursuant to Rule 26(a)(2)(B)(iii), Mr. Norris may use any of the materials identified in and/or referred to in his report as exhibits to summarize or support his opinions.

Additionally, the United States may elicit expert testimony, through direct or cross-examination, from any and all experts or representatives who have been or may be designated by or called by Plaintiff.

The United States reserves the right to call unidentified rebuttal witnesses, whose testimony cannot be predicted at this time. The United States reserves the right to supplement this disclosure and/or otherwise identify or call these unidentified rebuttal witnesses.

Respectfully submitted,

FRANCIS M. HAMILTON III
United States Attorney

By: s/J. Spencer Fair
J. Spencer Fair (TN BPR #028069)
Assistant United States Attorney
800 Market Street, Suite 211
Knoxville, Tennessee 37902
(865) 545-4167
Spencer.Fair@usdoj.gov

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and exact copy of the foregoing document has been served upon the following person via U.S. mail and email.

Cameron Kuhlman
Wettermark Keith, LLC
1232 Premier Dr., Ste. 325
Chattanooga, TN 37421
ckuhlman@wkfirm.com
(423) 933-1080

This 14th day of December, 2023.

s/J. Spencer Fair
J. Spencer Fair
Assistant United States Attorney



(865) 329-0007 (TELEPHONE)
(865) 329-0008 (FACSIMILE)

December 13, 2023

Mr. J. Spencer Fair, Esq.
United States Attorney's Office
Eastern District of Tennessee
800 Market Street, Ste. 211
Knoxville, TN 37902

RE: Summary of Findings and Opinions
In the matter of *Guthrie v. United States of America*
McMinn County, TN
PEC Project Number: 080723-3

Dear Mr. Fair:

The enclosed summary report documents my findings and professional opinions resulting from my investigation and engineering assessments in the matter of *Guthrie v. United States of America*. This summary report, and the findings and opinions presented therein, are intended for use in actual or potential litigation and are not to be used for other purposes.

If I may be of further assistance, please do not hesitate to contact me. With kindest regards, I remain,

Sincerely yours,
PARHAM ENGINEERING CONSULTANTS, INC.

A handwritten signature in blue ink, reading 'James E. Norris II'.

James E. Norris II, P.E.
Professional Engineer

Summary of Findings and Opinions

Motor Vehicle Crash

December 15, 2020

Highway 30 at County Road 550

McMinn County, Tennessee

In the Matter of

Guthrie v. United States of America

Case No. 1:22-CV-00162

United States District Court

For The Eastern District of Tennessee

Client Information

Mr. J. Spencer Fair, Esq.

United States Attorney's Office

Eastern District of Tennessee

800 Market Street, Ste. 211

Knoxville, TN 37902

Prepared by

James E. Norris II, P.E.

Parham Engineering Consultants, Inc.

253 South Peters Road

Knoxville, TN 37923



INCIDENT DESCRIPTION

The subject crash event is documented and described in *Tennessee Electronic Traffic Crash Report Number 220049209*. According to this report, the incident occurred in McMinn County, Tennessee on Tuesday, December 15, 2020 at approximately 9:49 AM. At that time, Ms. Sharon M. Guthrie was operating a 2010 Dodge RAM 3500 (Vehicle 1) eastbound on Highway 30. Meanwhile, Mr. Samuel S. Anderson was operating a 2006 Oshkosh M1075 military truck (Vehicle 2) eastbound on Highway 30. The *Tennessee Electronic Traffic Crash Report* indicates that this collision occurred during daytime hours on a two-way, four-lane roadway with dry pavement conditions and a speed limit of 55 miles per hour.

According to the *Crash Report*, Vehicle 2 was at the intersection of Highway 30 and County Road 550/603 attempting to make a left turn; due to its size, Vehicle 2 had to make a wide turn. Vehicle 1 attempted to pass Vehicle 2 on the left and was struck by Vehicle 2 while it was making its turn.

MATERIALS REVIEWED & ASSESSMENT ACTIVITIES

As part of my assessment in this matter, I have reviewed a number of documents and materials related to the subject crash event and resulting litigation. A listing of these documents/materials is presented in Appendix A. As a part of my investigation, I conducted an inspection of the collision site and corresponding roadway on September 15, 2023. This site inspection included the location of the collision and the roadway's characteristics leading up to and extending beyond the area of impact. During this site inspection, items examined included, but may not be limited to, the operating speed of traffic, traffic volume, available sight distance, pavement surface condition, roadway geometrics, grade of the roadway, and pavement cross-slope. On September 27, 2023, I also conducted an inspection of Vehicle 2. Vehicle 1 was not available for inspection at the time of my investigation.

FINDINGS OF THIS INVESTIGATION

During the course of this investigation, an assessment of the evidence related to this collision, as well as the corresponding roadway and vehicles, was conducted. Results of this assessment include, but may not be limited to, the following roadway and vehicular characteristics as they pertain to this particular case:

Roadway Characteristics

1. This incident occurred at the intersection of Highway 30 and County Roads 550/603 at an approximate latitude/longitude of 35.374490°N, 84.558890°W (See Photograph 1 in the Appendix).

2. No adverse roadway or weather conditions were reported at the time of the collision, which occurred during daytime conditions.
3. At the time of this incident, this section of Highway 30 had a posted speed limit of 55 miles per hour.
4. This section of Highway 30 is a minor arterial in a rural environment. TDOT traffic volume count data indicates that this section of roadway had an Annual Average Daily Traffic volume of approximately 11,183 vehicles per day in 2020 from McMinn County count station 54000070.
5. This section of Highway 30 has an asphalt-paved surface that was found to be in a “traveled” condition at the time of the incident.
6. This section of Highway 30 is a four-lane roadway that is oriented generally east and west, with two lanes in each direction. A grass median separates these opposing lanes, and each travel lane is approximately 12 feet in width. At the intersection with County Roads 550/603, the median includes a left-turn lane in each direction of travel.
7. The asphalt paved shoulder width on this section of Highway 30 is approximately 11 feet on the exterior lane and approximately 4 feet on the interior lane.
8. Along this section of Highway 30, the eastbound roadway transitions along a horizontal curve to the left and the roadway has a slight downhill grade of approximately -1.0 percent.

Incident Specific Evidence

9. Photographs were taken at the scene preserving some of the physical details of this incident. These photographs were used in the course of my review and assessment.
10. Vehicle 1 came to rest facing west in the interior (left) eastbound lane of Highway 30, with its rear extended onto the shoulder (See Photograph 2 in the Appendix).
11. Vehicle 2 came to rest facing east in the interior (left) eastbound lane of Highway 30, with its front extended into left-turn lane and median (See Photograph 3 in the Appendix).

Vehicular Characteristics

12. The damage to Vehicle 1 is consistent with a sideswipe style, slightly angled collision with damage located along the passenger side of the vehicle (See Photograph 4 in the Appendix).

13. Located in Vehicle 1's Airbag Control Module (ACM) is an Event Data Recorder (EDR), which may record information such as speed, engine RPMs, and brake application, regardless of air bag deployment in the event. However, because each EDR varies along with the availability of information for the device to record, there is not always a definitive set of data that is recorded or that may be recoverable. At the time of this report, there is no evidence that the data from Vehicle 1's EDR was preserved as evidence.
14. The damage to Vehicle 2 is consistent with a sideswipe style, slightly angled collision with damage located at the driver side front corner of the vehicle (See Photograph 5 in the Appendix).
15. Vehicle 2 is a single unit, non-articulated vehicle that was measured to be approximately 35.2 feet in length with wheelbase of approximately 26.3 feet in length.

SIGNIFICANT TESTIMONY

16. Ms. Sharon Guthrie (driver of Vehicle 1) provided her deposition testimony on November 29, 2023 as part of the discovery process in this case. A general summary of Ms. Guthrie's deposition, as it pertains to this collision, is as follows:

Ms. Guthrie states that when she pulled out onto Highway 30, the military truck (Vehicle 2) was already on Highway 30. She states that Vehicle 2 was traveling in the right lane, and she was traveling in the left lane. She states that as she got closer to Vehicle 2, it made a right turn then immediately made a left turn and struck the side of her vehicle. Ms. Guthrie estimates her speed at the time of the collision to have been 45 to 50 miles per hour and that Vehicle 2 was traveling at 35 to 40 miles per hour. She also estimates that she was about 75 to 100 feet from the truck when it started its turn. Ms. Guthrie also states that she did not enter into the turning lane at the intersection.

17. Mr. Samuel Anderson (driver of Vehicle 2) provided a statement on December 11, 2023 as part of the investigation in this case. A general summary of Mr. Anderson's statement, as it pertains to this collision, is as follows:

Mr. Anderson states that he was doing a test drive on Vehicle 2 after performing maintenance on it, and he was driving a route that he regularly used for that purpose. Mr. Anderson states that he was traveling in the left lane of Highway 30 while looking for a spot to make a U-turn to go back to the shop. When he saw the location at which he wanted to make the turn, he began to slow down and put on his left turn signal; he did not move over into the left-turn lane because he knew the turning radius of the vehicle was too big to make the turn from there. Mr. Anderson states that he looked behind but did

not see any other vehicles as he approached the U-turn location. Mr. Anderson also states that as he was turning, he hugged the center line between the travel lanes; he did not veer wide to the right or turn into any side road.

ASSESSMENT & ANALYSIS RESULTS

1. Due to the manner in which the incident occurred, an accurate speed estimate for Vehicle 1 was not able to be calculated. However, the available evidence is not consistent with Vehicle 1 traveling at a speed in excess of the posted speed limit at the time of the collision.
2. Based upon the available evidence, it is more probable than not that Vehicle 2 was traveling at a low speed (20 miles per hour or less) at the time of the collision.
3. Based on the aforementioned measurements of Vehicle 2 and design vehicle references, Vehicle 2 was found to have a centerline turning radius of approximately 40 feet. This is a large turning radius, similar to that of a city bus.
4. An assessment was conducted in regard to the U-turn maneuver that the driver of Vehicle 2 was attempting to make at the time of the incident. This assessment considered the aforementioned centerline turning radius of Vehicle 2, as well as the geometric layout of Highway 30 at the subject intersection with County Road 550. The results of this assessment indicate that Vehicle 2 would have had to “swing out” the right and partially enter the right lane of Highway 30 prior to initiating the left-turn in order to complete the U-turn maneuver at the intersection (See Diagram 1 in the Appendix).
5. An assessment was conducted in regard to the location of the impact between Vehicle 1 and Vehicle 2. This assessment considered the aforementioned turning path of Vehicle 2, as well as the damage profiles of both vehicles. The assessment also considered the final rest positions of both vehicles, as well as the interaction between the vehicles and how they traveled to their final rest positions. The results of this assessment indicate that, more probable than not, the impact occurred in the median area of the intersection, with Vehicle 1 only partially in the left (interior) travel lane of Highway 30 (See Diagram 2 in the Appendix).
6. In her deposition, Ms. Guthrie (driver of Vehicle 1) testified that Vehicle 2 was originally traveling in the right lane prior to making a right turn then immediately turning to the left to strike her vehicle. She also testified she believed her speed at the time of the collision to have been 45 to 50 miles per hour and that Vehicle 2 was traveling at 35 to 40 miles



per hour. An assessment was conducted related to this testimony, and the results are as follows:

- a. Based upon the damage profile of both vehicles, as well as the location and angle of Vehicle 2 at final rest, the available evidence is not consistent with Vehicle 2 beginning its maneuver from the right lane of Highway 30.
 - b. Based upon the damage profile of both vehicles, as well as the vehicle locations at final rest, the available evidence is not consistent with Vehicle 2 traveling at 35 to 40 miles per hour at the time of impact.
7. An overall assessment of the available evidence and aforementioned assessment results was conducted in regard to the occurrence of this incident. The results of that overall assessment indicate that the incident most probably occurred as follows:
- a. Both vehicles were initially traveling eastbound on Highway 30 in the left lane, with Vehicle 2 ahead of Vehicle 1 at an unknown distance.
 - b. As it approached the intersection of Highway 30 and County Road 550, Vehicle 2 began to slow down in preparation for making a U-turn maneuver through the median area of the intersection.
 - c. Vehicle 2 had to “swing out” the right and partially enter the right lane of Highway 30 prior to turning back to the left to make the U-turn. The driver of Vehicle 1 likely interpreted this as Vehicle 2 moving to the right lane and was preparing to overtake the vehicle in the left lane when it turned back to the left. As a result, the driver of Vehicle 1 made an evasive maneuver to the left and the vehicles collided in the median area in an angled, sideswipe style collision.
 - d. Overall, the occurrence of this incident is more consistent with the description provided by the driver of Vehicle 2 (Mr. Anderson) than the account provided by the driver of Vehicle 1 (Ms. Guthrie) in her deposition testimony.

CLOSURE

These statements are a summary of the conclusions and professional opinions I have developed while evaluating the available material, as it relates to this particular case. These conclusions and professional opinions are based upon the information and data that were available to me at the time this statement was released. These conclusions and professional opinions may be revised if additional information, evidence, or issues arise and become available, or if witnesses provide information that conflicts with or expands upon the current



understanding of the case. These conclusions and opinions are intended for use in actual or potential litigation and are not to be used for other purposes.

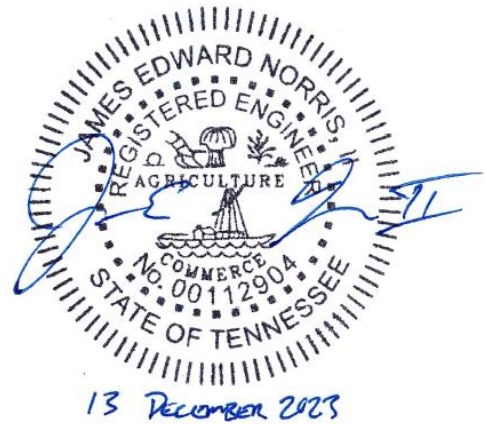
Prepared by:

A handwritten signature in blue ink, reading "James E. Norris II", is written over a horizontal line.

James E. Norris II, P.E.

Professional Engineer

PARHAM ENGINEERING CONSULTANTS, INC.





APPENDIX A

Materials Reviewed

Data, Information, and Exhibits Considered in Forming Opinions

- 1) Tennessee Electronic Traffic Crash Report #220049209
- 2) Motor Vehicle Accident (Crash) Report
- 3) Scene photographs provided by Client
- 4) Vehicle damage photographs provided by Client
- 5) Complaint
- 6) Answer to Complaint
- 7) Maintenance Request/Work Order Documents for Vehicle 2
- 8) Plaintiff Initial Disclosures
- 9) Plaintiff's Response to Defendant's Request for Production
- 10) Plaintiff's Response to Defendant's Interrogatories
- 11) Deposition of Sharon Guthrie taken on November 29, 2023
- 12) Statement of Mr. Samuel Anderson taken on December 11, 2023
- 13) Tennessee Department of Transportation (TDOT) Functional Classification Map for McMinn County
- 14) Tennessee Department of Transportation (TDOT) Traffic Count Data
- 15) Vehicle specifications – 2010 Dodge RAM 3500
- 16) CARFAX Vehicle History Report for Dodge RAM 3500

Technical Reference Materials Considered in Forming Opinions

Due to the specialized knowledge base that is required in Civil Engineering, Highway Design, and Accident Reconstruction, providing an exhaustive list of all information used (e.g., calculus, physics, etc.) is not feasible. Therefore, the Technical Reference Materials include, but may not be limited to, the following:

- 1) Lynn B. Fricke, *Traffic Crash Reconstruction: Volume 2 of the Traffic Accident Investigation Manual*, Northwestern University Traffic Institute (Second Edition, 2010)
- 2) J. Stannard Baker and Lynn B. Fricke, *Traffic Collision Investigation* (Tenth Edition, 2002)
- 3) Google Earth's Aerial Photographs
- 4) Google Street View
- 5) Course materials from *Human Factors in Traffic Crashes* (Northwestern University Center for Public Safety)
- 6) Dr. Paul L. Olson and Mr. Eugene Farber, in their book *Forensic Aspects of Driver Perception and Reaction, Second Edition* (2003)
- 7) *A Policy on Geometric Design of Highways and Streets*. (2001) American Association of State Highway and Transportation Officials (AASHTO)



APPENDIX B

Exhibits: Aerial, Scene, & Vehicle Photographs, Diagrams



Photograph 1: Aerial View of Incident Area (Source: Google Earth)



Photograph 2: Vehicle 1 Final Rest (Source: Client)



Photograph 3: Vehicle 2 Final Rest (Source: Client)




Photograph 4: Vehicle 1 Damage (Source: Client)



Photograph 5: Vehicle 2 Damage (Source: Client)


Legend Of Symbols



Vehicle 2 (V2) En Route (2006 Oshkosh M1075)

Graphical Scale

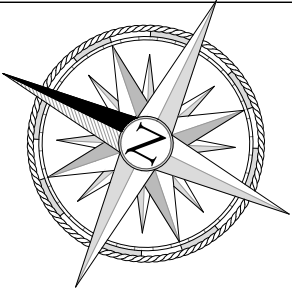
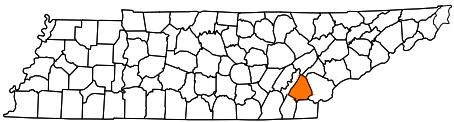
Scale: 1" = 30'



0'30'60'90'120'

Note: For this drawing to be at the stated scale, the overall length of this graphical scale must be four inches.

McMinn County, Tennessee



Notes:





1. A regulatory speed limit of 55 mph is posted for this section of roadway.
2. Roadway is paved with asphalt and has a good surface texture.
3. Locations of vehicles and its their paths are approximate.
4. Site inspection and site survey were conducted on September 15, 2023.
5. Vehicle 2 inspection was conducted on September 27, 2023; Vehicle 1 was not available at this time.
6. Other topographic features exist in this vicinity but are not shown on this diagram.
7. Directional North is a general approximation based on U.S.G.S. topographical maps.
8. This drawing is intended for use in actual or potential litigation and is not to be used for any other purpose.

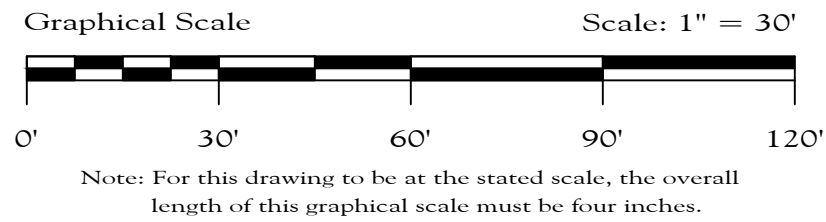
Guthrie
v.
United States
McMinnCounty, Tennessee
Highway 30 @
County Road 550
Date of Accident: December 15, 2020
Accident Report No: 220049209
PEC Number: 080723-3

Diagram 1: Vehicle 2 Turn Path
Roadway Plan View
December 2023

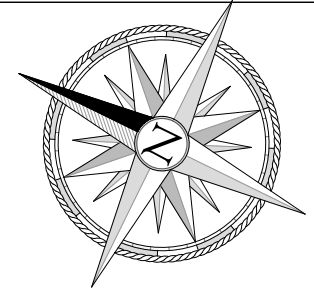
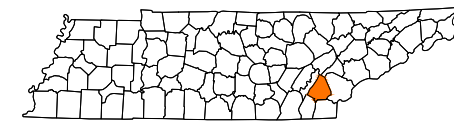


Legend Of Symbols

-  Vehicle 1 (V1) En Route (2010 RAM 3500)
-  Vehicle 1 (V1) Final Rest
-  Vehicle 2 (V2) En Route (2006 Oshkosh M1075)
-  Vehicle 2 (V2) Final Rest



McMinn County, Tennessee



Notes:

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Highway 30 @
County Road 550

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Diagram 2: Overall Accident Site Diagram

Roadway Plan View

December 2023



P.O. Box 6215
Knoxville, TN 37914
865-329-0007

ATTACHMENT

Curriculum Vitae James E. Norris II, P.E.



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KNOXVILLE, TN 37923
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CURRICULUM VITAE

James E. Norris II, P.E., ACTAR

Mr. Norris is a practicing professional engineer and analyst with Parham Engineering Consultants, a Civil and Forensics Engineering Firm specializing in motor vehicle accident reconstruction. He has over fourteen years of experience in Forensic Engineering and motor vehicle accident reconstruction for passenger and commercial motor vehicles, motorcycles, bicyclists, and pedestrians. His experience in these areas includes analysis in areas such as vehicle speeds, timing and distance, avoidability, human factors, and roadway design, as well as the retrieval and assessment of data from vehicle Event Data Recorders. He also has expert witness testimony experience in trials and depositions. Mr. Norris' primary specialization is commercial motor vehicle accident reconstruction.

Prior to joining Parham Engineering Consultants, Mr. Norris developed experience in general civil engineering, traffic operations and engineering, civil site design, design plan review, and transportation planning. This variety of engineering experience enhances his capabilities in the accident reconstruction arena. While working in various roles for the Federal Government as well as the local Knoxville government, Mr. Norris has developed an ability to explain complex engineering issues in clear and understandable terms to laypersons and peers alike.

Parham Engineering Consultants' clientele includes plaintiff, defense & criminal defense attorneys, insurance companies, construction contractors, and land developers. Parham Engineering Consultants utilizes forensic investigation techniques and sound engineering/physics principles to identify collision causation and contributing factors.

EDUCATION

FORMAL EDUCATION

Master of Science, Civil Engineering, University of Tennessee, Knoxville, Tennessee, 2005

Special Project: *An Application and Assessment of the Bicycle Compatibility Index*

Bachelor of Science, Civil Engineering, University of Tennessee, Knoxville, Tennessee, 2004

CONTINUING EDUCATION & CONFERENCES

SAE International – Applying Automotive EDR Data to Traffic Crash Reconstruction, 2023
Institute of Transportation Engineers – Wrong-Way Driving Crashes: Predictive Models and Low-Cost Countermeasures, 2022
Institute of Transportation Engineers – Forensic Accident Reconstruction & Human Factors in Collisions, 2022
SAE International – Vehicle Crash Reconstruction: Principles and Technology, 2022
SAE International – Reconstruction and Analysis of Rollover Crashes of Light Vehicles, 2021
University of Tennessee, College of Civil Engineering, CE 556/CE409 Traffic Crash Reconstruction.
Guest Lecturer: *“Heavy Vehicle Accident Reconstruction”* 2021
University of Tennessee, College of Civil Engineering, CE 556/CE409 Traffic Crash Reconstruction.
Guest Lecturer: *“Event Data Recorders”* 2021
Tennessee Society of Professional Engineers – Knoxville Chapter Meeting May 2021 – Presenter: *“Forensic Engineering for Motor Vehicle Accident Reconstruction”*
International Association of Defense Counsel – Webinar January 2021 – Presenter: *“Legal Challenges Regarding Event Data Recorder Evidence”*
Crash Data Group – EDR Summit 2020, Houston, Texas – Presenter: *“Legal Challenges Regarding EDR Data in Testimony”*
University of Tennessee, College of Civil Engineering, CE 556/CE409 Traffic Crash Reconstruction.
Guest Lecturer: *“Heavy Vehicle Accident Reconstruction”* 2019
University of Tennessee, College of Civil Engineering, CE 556/CE409 Traffic Crash Reconstruction.
Guest Lecturer: *“Event Data Recorders”* 2019
Tennessee Professional Investigators Association – 2019 Professional Education Seminar – Presenter: *“Accident Reconstruction”*
Crash Data Group – EDR Summit 2019, Houston, Texas
SAE International - Accessing and Interpreting Heavy Vehicle Event Data Recorders, 2018
Crash Data Group – EDR Summit 2018, Houston, Texas – Presenter: *“Legal Challenges regarding EDR Data – Consultant Perspective”*
National Academy of Forensic Engineers, NAFE Regular Seminar – Application of Engineering in the Jurisprudence System, July 2017, Atlanta, Georgia
National Academy of Forensic Engineers, NAFE Special Seminar – Forensic Engineering and Analytical Techniques, July 2017, Atlanta, Georgia
Crash Data Group – EDR Summit 2017, Houston, Texas
SAE International – Tire Forensic Analysis, 2016, Detroit, Michigan
Tennessee Transportation Assistance Program: Work Zone Traffic Control & Flagging Certification, Knoxville, Tennessee, 2014
Institute of Police Technology and Management, University of North Florida – Event Data Recorder Use in Traffic Crash Reconstruction, Jacksonville, Florida, 2013

CURRICULUM VITAE

James E. Norris II, P.E., ACTAR



Advanced Crash Reconstruction Utilizing Human Factors Research, Evanston, Illinois, 2012
Bendix Spicer Foundation Brake LLC – Heavy Duty Vehicle Air Brake Systems Training, 2011
SAE International - Accessing and Interpreting Heavy Vehicle Event Data Recorders, 2010
American Traffic Safety Services Association, Traffic Control Technician, 2010
Northwestern University – Heavy Vehicle Accident Reconstruction, Evanston, Illinois, 2009
Northwestern University – Accident Investigation I Online, 2008
Southern District ITE Annual Meeting, Knoxville, Tennessee, 2007
University of Tennessee - Designing Streets for Bicyclists & Pedestrians, Knoxville, Tennessee, 2007
FHWA/US DOT Road Safety Audits, Knoxville, Tennessee, 2006
NHI Advancing Transportation Systems Management & Operations, Nashville, Tennessee, 2006
TRB “Tools of the Trade” 10th National Conference, Nashville, Tennessee, 2006
Southern District ITE Annual Meeting, Savannah, Georgia, 2006
NTI Introduction to Transportation Air Quality Conformity, Chattanooga, Tennessee, 2006
Transportation Research Board Annual International Meeting, Washington, D.C., 2005

LICENSURE, ORGANIZATION MEMBERSHIPS, AND HONORS

Registered as a Professional Engineer (P.E.) in the State of Tennessee
Registered as a Professional Engineer (P.E.) in the State of Alabama
Registered as a Professional Engineer (P.E.) in the State of Georgia
Registered as a Professional Engineer (P.E.) in the State of Kentucky
Registered as a Professional Engineer (P.E.) in the State of South Carolina
Remote Pilot - Small Unmanned Aircraft Systems, FAA Certificate #4667579
Accreditation Commission for Traffic Accident Reconstruction (ACTAR), Number 1993
National Academy of Forensic Engineers, Senior Member
Society of Automotive Engineers International
National Society of Professional Engineers, Member
Tennessee Society of Professional Engineers, Knoxville Chapter, Member
 State Board Member, 2018 – 2020
 President, 2017 – 2018
 Vice President 2016 – 2017
 Young Engineer of the Year
 Secretary 2012 – 2016
Institute of Transportation Engineers, Member
2016 *Young Engineer of the Year Award*, Tennessee Society of Professional Engineers, Knoxville Chapter

PUBLICATIONS

CURRICULUM VITAE

James E. Norris II, P.E., ACTAR



“Legal Challenges Regarding EDR Data in Testimony”. James Norris, P.E. and David Chapman. Collision Magazine, Volume 15, Issue 1. 2021

PROFESSIONAL EXPERIENCE

Parham Engineering Consultants, Inc., Knoxville, Tennessee

Engineer, General Civil & Transportation Analyses and Consulting, Accident Investigation and Reconstruction, May 2007 – Present

Knoxville Regional Transportation Planning Organization, Knoxville, Tennessee

Transportation Engineer, January 2006 – May 2007

Knoxville Regional Transportation Planning Organization, Knoxville, Tennessee

Transportation Intern, September 2004 – December 2005

James H. Quillen VA Medical Center, Johnson City, Tennessee

Civil Engineering Co-op Student, 2002-2004 - (3 terms)

Transportation Planning and Civil Engineering

Principal Areas of Practice

- ♦ Planning Studies
- ♦ Corridor Studies
- ♦ Functional and Preliminary Transportation Studies
- ♦ Traffic Operational & Engineering Design Analysis
- ♦ Construction Design Plans and Specifications
- ♦ Construction and Contract Administration

Civil Engineering/Design

- ♦ James H. Quillen VA Medical Center, Infrastructure Renovation, Johnson City, TN

Legend Of Symbols

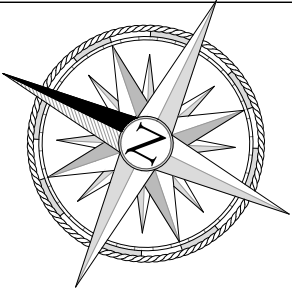
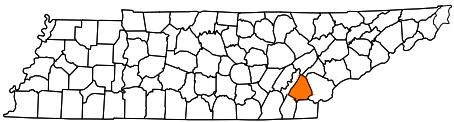
Vehicle 2 (V2) En Route (2006 Oshkosh M1075)

Graphical Scale

Scale: 1" = 30'

Note: For this drawing to be at the stated scale, the overall length of this graphical scale must be four inches.

McMinn County, Tennessee



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Date of Accident: December 15, 2020
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Diagram 1: Vehicle 2 Turn Path
Roadway Plan View
December 2023



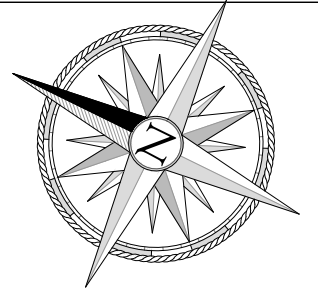
P.O. Box 6215
Knoxville, TN 37914
865-329-0007

Legend Of Symbols

	Vehicle 1 (V1) En Route (2010 RAM 3500)
	Vehicle 1 (V1) Final Rest
	Vehicle 2 (V2) En Route (2006 Oshkosh M1075)
	Vehicle 2 (V2) Final Rest

0' 30' 60' 90' 120'

Note: For this drawing to be at the stated scale, the overall length of this graphical scale must be four inches.



1. A regulatory speed limit of 55 mph is posted for this section of roadway.
2. Roadway is paved with asphalt and has a good surface texture.
3. Locations of vehicles and its their paths are approximate.
4. Site inspection and site survey were conducted on September 15, 2023.
5. Vehicle 2 inspection was conducted on September 27, 2023; Vehicle 1 was not available at this time.
6. Other topographic features exist in this vicinity but are not shown on this diagram.
7. Directional North is a general approximation based on U.S.G.S. topographical maps.
8. This drawing is intended for use in actual or potential litigation and is not to be used for any other purpose.

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Deposition Testimony Listing for James E. Norris, II, P.E., ACTAR (2019 - 2023)

Case Style	Docket No.	Attorney & Firm	Court	Date
Woodward v. Koch Foods, et al.	16STCV112	Annarita L. McGovern, Esq. Coleman Talley LLP	Walker County, Georgia State Court	January 9, 2019
Moore & Goodman v. Southern Honda Powersports	21710	Thomas E. LeQuire, Esq. Spicer Rudstrom, PLLC	Marion County, Alabama Circuit Court	March 20, 2019
Byrd, et al. v. Buie, et al.	1:17-cv-00273	John W. Chandler, Esq. The Hamilton Firm	United States District Court Easten District of Tennessee at Chattanooga	April 15, 2019
Bradley, et al. v. William S. Trimble Company, Inc.	3-349-17	Sidney Gilreath, Esq. Gilreath & Associates	Knox County, Tennessee Circuit Court	January 29, 2020
Moore v. PSC Metals, et al.	17C1037	James R. Kennamer, Esq. McMahan Law Firm	Hamilton County, Tennessee Circuit Court	July 27, 2020
Gardner v. Holley Living Trust, et al.	31831	J. Christopher Rose West & Rose	Washington County, Tennessee Circuit Court	August 14, 2020
Norcia v. Stulce	18C263	Buddy B. Presley, JR Presley Law Firm	Hamilton County, Tennessee Circuit Court	November 30, 2020
Murray v. Markwardt	25440-III	P. Richard Talley, Esq. Talley Law	Jefferson County, Tennessee Circuit Court	August 25, 2021
Batey v. Palatec Trucking, et al.	19-CV-128	James R. Tomkins, Esq. Smith & Tomkins	Lincoln County, Tennessee Circuit Court	December 7, 2021
Norcia v. Stulce	18C263	Buddy B. Presley, JR Presley Law Firm	Hamilton County, Tennessee Circuit Court	April 13, 2022
Gomez, et al. v. South Carolina Department of Transportation	2020-CP-23-04812	Austin H. Crosby, Esq. Parker Law Group	Greenville County, South Carolina Court of Common Pleas	June 29, 2022
Burrows v. Imerlishvili & Bombora Auto, LLC	2:22-cv-73	Thomas J. Smith, Esq. Garza Law Firm	Greeneville, Tennessee United States District Court	September 6, 2023

Trial Testimony Listing for James E. Norris, II, P.E., ACTAR (2019 - 2023)

Case Style	Docket No.	Attorney & Firm	Court	Date
State of Tennessee v. Emily Williams	112985	John B. Dupree Attorney at Law	Criminal Court Knox County, Tennessee	August 7, 2019
Snyder v. Knowles & Johnson-Brown	3-28-18	Sidney W. Gilreath, Esq. Gilreath & Associates	Circuit Court Knox County, Tennessee	November 14, 2019
Norcia v. Stulce	20C797	Buddy Presley, Esq. Presley Law Firm	Circuit Court Hamilton County, Tennessee	February 1, 2023
State of TN v. Shane Mann	26419-II	John C. Barnes, Esq. Barnes & Fersten	Circuit Court Sevier County, Tennessee	April 21, 2023
State of TN v. Alexis Faxon	S75997	Louis D. Torch, Esq. Office of the District Attorney General Sullivan County	Criminal Court Sullivan County, TN	April 26, 2023
Morgan v. Scroggs	V18202S	W. Tyler Chastain, Esq. Bernstein, Stair & McAdams, LLP	Circuit Court Monroe County, TN	August 30, 2023